

Stuart C. Gaul, Jr.

From: Keri P. Ebeck

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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to legal service™*

[REDACTED]

[REDACTED]



[REDACTED]

From: Mark A. Lindsay <mlindsay@bernsteinlaw.com>

Sent: Tuesday, May 2, 2023 11:30 AM

To: John Lacher <jlacher@lynchlaw-group.com>

Subject: RE: U LOCK

John – subpoena exhibit is attached. [REDACTED] Thanks.

Mark

Mark A. Lindsay, Esq.



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to legal service™*

601 Grant Street, 9th Floor | Pittsburgh, PA 15219

mlindsay@bernsteinlaw.com | P: 412.456.8121 | F: 412.456.8135



From: John Lacher <jlacher@lynchlaw-group.com>

Sent: Tuesday, May 2, 2023 10:59 AM

To: Mark A. Lindsay <mlindsay@bernsteinlaw.com>

Subject: FW: U LOCK

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Mark,

Please see below and let me know where we're at on this. Thank you.

John

From: John Lacher
Sent: Wednesday, April 26, 2023 2:50 PM
To: mlindsay@bernsteinlaw.com
Subject: U LOCK

Mark,

As discussed, please forward me a copy of the Subpoena issued to Citizens Bank in the U LOCK Case. Also, let me know when/if you're ready to further discuss resolving the Biros Objection to the Shanni Snyder Claim. Thank you.

John

John Lacher
Partner

Wkh#0 | qfk#0dz #J urxs#

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EXHIBIT A
INFORMATION AND DOCUMENTS
TO BE PRODUCED BY CITIZENS BANK, N.A.

I. DEFINITIONS

1. “Citizens” means Citizens Bank, N.A., its current and former parents and/or predecessors, successors, subsidiaries, affiliates, and/or each of their present and past members, managers, employees, agents, attorneys and/or any and all persons and/or business entities acting and/or purporting to act for or on their behalf.

2. “Document” means all materials discoverable pursuant to the Federal Rules of Bankruptcy Procedure and Federal Rules of Civil Procedure, including without limitation the following items, whether electronic, printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery, namely: notes, letters, correspondence, communications, text messages, tweets and retweets, Instagram posts, website posts, telegrams, social media posts or comments, memoranda, blog entries, instant messages, summaries or records of telephone conversations, summaries or records of personal conversations, diaries, reports, research reports and notebooks, charts, plans, drawings, photographs, minutes or recordings of meetings, including directors’ meetings, reports or summaries of interviews, reports or summaries of investigations, opinions or reports of consultants, opinions of counsel, agreements, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of documents, data compilations, e mail, electronically stored data, computer tapes or disks, computer printouts, computer directories, computer files and all material fixed or recorded in or on any medium or from which any material can be obtained, translated, or recovered, including without limitation deleted but recoverable data, including without limitation computers, of whatever kind known to

you or in your possession, custody and/or control. The term “document” also includes all copies which are not identical to the original.

3. “Person” or “persons” means, refers to and includes natural persons, corporations, professional corporations, limited liability partnerships, firms, partnerships, associations, joint ventures, trusts, trustees, proprietorships, entities, government or governmental entities, and all other forms of organizations, associations or entities, and any past or present officer, director, partner, principal, agent, trustee, beneficiary, or representative of such person.

4. “All” means “any and all” and the word “any” means “any and all.”

5. The terms “and,” “or,” and “and/or” are used herein in their general sense and are not intended to limit the scope of any Requests. The terms shall be construed as broadly as possible to bring within their scope all discoverable information which might otherwise be excluded.

II. INSTRUCTIONS

1. Responses to these Requests shall be supplemented as required by the Bankruptcy Rules of Civil Procedure, the Federal Rules of Civil Procedure and accompanying case law. These Requests shall be deemed to impose a continuing duty upon you to properly and timely serve upon Christine Biros supplemental documents.

2. With respect to the documents produced, you shall produce them as they are kept in the usual course of business. If you have no documents or things responsive to a particular request, so state.

3. All definitions above are applicable to these requests whether they are capitalized or in lowercase.

4. Electronically stored information, including but not limited to emails and instant messages, shall be produced in the form or forms in which it is ordinarily maintained (“native form”) or in a form that is reasonably usable.

5. With respect to any responsive information or documents as to which you assert a claim of privilege or other immunity from discovery, you shall submit a list identifying each such document or piece of information by stating:

- (i) its type (*e.g.*, letter, inter-office memorandum, note, etc.), subject matter, title, date, and the number of pages thereof;
- (ii) the identity of each person who participated in its preparation;
- (iii) the identity of each person who signed or sent the document;
- (iv) the identity of each person to whom the document or information was addressed, copied to or sent;
- (v) the identity of each person who received the document or information; and
- (vi) the basis of the claim of privilege or immunity.

6. In the event that any requested information or document is known to have existed and cannot now be located or has been destroyed or discarded, that information or document shall be identified by:

- (i) the last known custodian;
- (ii) date of destruction or discard;
- (iii) the manner of destruction or discard;
- (iv) the reason(s) for destruction or discard;
- (v) as to lost or misplaced documents, the efforts made to locate such documents;
- (vi) a statement describing the document, including a summary of its contents;
- (vii) the identity of its author(s); and

(viii) persons to whom it was sent or shown.

7. For documents originally collected in paper form, all associated file labels, file headings thereon, and file folders shall be produced together with the responsive documents from each file such that the labels, headings, and folders precede the documents with which they are associated. Each page shall be given a discrete production number.

III. INFORMATION AND DOCUMENT REQUESTS

1. Please confirm/verify that Checking Account No. [REDACTED] 6386 (as referenced in the transaction section on page 1 of the enclosed Savings Account Statement) is a Citizens account.

2. Please provide the full name of the account holder listed on Checking Account No. [REDACTED] 6386.

3. Please provide the full name(s) of any person(s) authorized to:

- a. Sign checks on behalf of Checking Account No. [REDACTED] 6386;
- b. Access Checking Account No. [REDACTED] 6386;
- c. Make withdrawals from Checking Account No. [REDACTED] 6386; and
- d. Make deposits into Checking Account No. [REDACTED] 6386.

4. Please provide the date on which Checking Account No. [REDACTED] 6386 was opened or otherwise created.

5. Documents sufficient to verify the information requested in Requests 1, 2, 3, and 4, as set forth directly above.